



November 9, 2017

*Via Electronic Filing*

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: **Starry, Inc. Letter**; *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al.*, GN Docket No. 14-177, IB Docket Nos. 15-256 and 97-95; RM-11664; and WT Docket No. 10-112

Dear Ms. Dortch:

The evolution to 5G is an enormous opportunity for the United States, both in terms of the advanced services it will enable for U.S. consumers and businesses, and the economic activity it will generate. Starry, Inc. strongly believes the Commission can best capitalize on this opportunity by taking a balanced approach to spectrum access that includes exclusively licensed, shared licensed, and unlicensed spectrum access.

We encourage the Commission to increase the amount of spectrum available for all wireless broadband services. Spectrum is the life blood of all wireless networks, and making it available as quickly as possible will allow operators to plan and deploy networks at scale, fast. These new networks, technologies, and services will be driven by a diverse set of interests, including Starry and other innovative technology companies, the unlicensed community, cable operators and other service providers, and of course, the mobile wireless industry.<sup>1</sup> Importantly, shared licensed spectrum creates an avenue for additional investment from all of these potential users.<sup>2</sup>

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<sup>1</sup> See Marvell Semiconductor, Inc. *Letter*, GN Docket No. 14-177 et al. (filed Nov. 6, 2017) (Marvell Ex Parte); Wireless Internet Service Provider Association *Ex Parte*, GN Docket No. 14-177 et al. (filed Nov. 2, 2017) (Marvell Ex Parte); Open Technology Institute, Consumers Union, and Public Knowledge *Ex Parte*, GN Docket No. 14-177 et al. (filed Nov. 7, 2017); NCTA-The Internet & Television Association *Comments*, GN Docket No. 14-177 et al. (filed Sept. 30, 2016).

<sup>2</sup> See Starry, Inc. *Ex Parte*, GN Docket No. 14-177 et al. (filed Nov. 6, 2017); Starry, Inc. *Ex Parte*, GN Docket No. 14-177 et al. (filed June 1, 2017) (reporting on a meeting with Chairman Pai where Starry investors "Mr. Sarnoff and Mr. Jani offered an investor perspective on the market and how preserving a diverse licensing approach (sharing,

As it makes this spectrum available, the Commission should recognize that millimeter wave spectrum carries unique policy advantages. Most importantly, because of the significant quantity of spectrum and its physical characteristics, terrestrial spectrum access decisions are not binary. The Commission does not have to choose between exclusively licensed, shared licensed, or unlicensed. It can use all three access models simultaneously, and at zero cost to each other. At the advent of a new generation of technology, it is in the country's interest to incubate a wide array of technologies and services, through various spectrum access modes, to maximize the likelihood that the U.S. successfully leads the world in 5G.

Furthermore, shared spectrum schemes can be simple, and can be built on a foundation of spectrum sharing methods that have been used for decades. For instance, Starry has suggested the Commission could start with a very simple sharing methodology based on the existing Part 101 coordination process.<sup>3</sup> Since at least 1996, this type of coordination methodology has been used for fixed links (and since 1997 for modern land mobile systems under Part 90).<sup>4</sup> This year alone, at least 8,800 authorizations for fixed microwave links have been granted using this simple coordinated sharing mechanism.<sup>5</sup>

Most importantly, if the Commission acts quickly to set the sharing rules for the 37-37.6 GHz band it will be the best near term opportunity for access to millimeter wave spectrum for all users. Starry urges the Commission to move this debate forward by denying the petitions for reconsideration so that it can focus on the collaborative process of developing an effective, efficient, and robust sharing mechanism as quickly as possible.

Respectfully Submitted,  
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exclusively-licensed and unlicensed) in these bands would spur additional investment in a wide range of companies, using Starry as a primary example."); Marvell Ex Parte; WISPA Ex Parte.

<sup>3</sup> Starry, Inc. Letter, GN Docket No. 14-177 et al. (July 14, 2017).

<sup>4</sup> See *Reorganization and Revision of Parts 1, 2, 21, and 94 of the Rules to Establish a New Part 101 Governing Terrestrial Microwave Fixed Radio Services, Amendment of Part 21 of the Commission's Rules for the Domestic Public Fixed Radio Services, McCaw Cellular Communications, Inc. Petition for Rulemaking*, Report and Order, 13 FCC Rcd 13449 (1996); *Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify the Policies Governing them, Examination of Exclusivity and Frequency Assignments Policies of the Private Land Mobile Services*, Second Report and Order, 12 FCC Rcd 14307 (1997).

<sup>5</sup> As determined by searching the Commission's Universal Licensing System for active licenses granted between January 1, 2017 and November 9, 2017 in the Common Carrier Fixed Point to Point Microwave service, the Microwave Industry/Business Pool service, and the Millimeter Wave 70/80/90 GHz service.